

REMARKS

The Examiner has objected to claims 20 and 21, which are being canceled along with the other method claims to simplify the issues. The Examiner has rejected claims 1-3, 7, 12, and 20 under 35 U.S.C. §103(a) as being unpatentable over what the Examiner referred to as Applicants' admission as prior art (Fig. 1) in view of Gielen U.S. Patent No. 5,771,050 ("*Gielen*"). Claims 6, 13, and 16-17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Applicants' prior art in view of *Gielen* and further in view of Spinar et al. U.S. Patent No. 5,126,754 ("*Spinar*"). Applicants respectfully traverse the rejection, but are canceling the method claims 1-12, 21 and 22 to simplify the issues. Applicants are also canceling claims 13-15, rewriting claim 16 in independent form, and further amending claim 16 to more specifically recite structure from Fig. 3, at the suggestion of the Examiner in a telephone interview of May 2, 2011, discussed more fully below.

At the interview, Applicants' counsel stressed that Applicants' apparatus is distinctly different than the prior art, because Applicants' apparatus:

measures ***a distance***
brought about ***by one motion system*** (the web feed relative to the printing station on the machine frame)
while correcting a feed error determined from that measurement ***by adjusting the printhead position*** relative to the web ***with a different motion system*** (one for moving the printhead relative to the stationary indexed web).

Applicants argued that there are no teachings in the references of any use of an error determination from a measurement of the feeding of the web through the machine to correct the error so measured by adjusting the position of the printhead on the machine.

What Applicants have admitted is that encoders have been used in closed loop feedback systems that measure web feed to alter web feed to eliminate feed error. This does not teach the use of the measurement to move a printhead instead of the web to correct the error.

The *Gielen* reference discloses two motion systems, but both move by detecting ***the position*** of a printed mark on the web and controlling motion relative to the detected position of the mark in both cases. The web feed motion is stopped in response to the reading of the mark's position, while fine correction is made by moving the printhead nozzles also in response to a sensing of the printed mark on the web.

The devices in the prior art and the apparatus of Applicants are mutually inconsistent ways of attempting to eliminate feed error and achieve precision in printing. The references require the printing of registration marks. Applicants' apparatus avoids this undesirable necessity.

In the interview, the Examiner questioned whether the language of claim 13 contained sufficient language to support a patentable distinction over the teachings of the combined prior art set forth in the rejection. The Examiner suggested that Applicants look to Fig. 3 of the application and the structure illustrated therein regarding the carrier and the motor on the carrier that is configured to move the printhead along the direction of the motion of the substrate. Accordingly, Applicants are also canceling claims 13-15 and amending claim 16 in accordance with the suggestion of the Examiner.

It is submitted that the claims, as amended, are allowable.

Following communication of a draft of this amendment to the Examiner, the Examiner indicated that the amendment should overcome the art of record, but may require a further search.

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In view of the foregoing amendments to the claims and remarks given herein, Applicants respectfully believe this case is in condition for allowance and respectfully request allowance of the pending claims.

Respectfully submitted,
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